FILED

ARENCE MADDOX

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. <u>00-6312-CR-ROETTGER</u>

UNITED STATES OF AMERICA,

Plaintiff. NIGHT BOX VS. JERMAINE WILLIAMS, CLERK, USDC/SDFL/FTL Defendant.

GOVERNMENT'S NOTICE OF EXTENSIVE SENTENCING HEARING

Comes now the United States of America by and through the undersigned Assistant United States Attorney and files this notice of extensive hearing in compliance with Administrative Order 95-02 and in support thereof states as follows:

- 1. This defendant is scheduled for sentencing on March 29, 2002 at 10:30 a.m.
- 2. Esham Ruiz and Frank Granja, the victim Brinks guards, have indicated that they wish to address the court at sentencing. Both guards suffered extensive physical and psychological injuries in the attempted robbery.
- 3. Additionally, the government intends to present the expert forensic testimony of FBI Firearms Examiner Douglas Murphy. This testimony is necessary because defendant Williams stated at the plea that he "didn't recall if he shot the guards."
- 4. Doctor Leonard Alonso, the treating phychiatrist for both of the victim guards will be testifying as to the psychological impact of their injuries.
 - 5. Due to the anticipated extensive testimony of the above mentioned witnesses it is



anticipated that this sentencing will exceed the standard time normally allowed for sentencing.

The government respectfully requests that this Honorable Court consider allocating one and a half hours for this sentencing.

WHEREFORE, based on the above, the government respectfully requests that this court schedule the appropriate amount of time for the sentencing hearing in this matter.

Respectfully submitted,

GUY A. LEWIS

UNITED STATES ATTORNEY

By:

THOMAS P. LANIGAN

ASSISTANT UNITED STATES ATTORNEY

Court # A550033

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 22 ~00 day of January, 2002 to: Darryl Wilcox, AFPD, 1 E. Broward Blvd., Suite 1100, Ft. Lauderdale, FL. 33301.

ÍHOMAS P. LANIGAN

ASSISTANT UNITED STATES ATTORNEY